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13 **UNITED STATES DISTRICT COURT**

14 **EASTERN DISTRICT OF CALIFORNIA**

15
16 THE CALIFORNIA SPORTFISHING
17 PROTECTION ALLIANCE, a California
18 nonprofit corporation,

19 Plaintiff,

20 vs.

21 Tri C Manufacturing, Inc., a California
22 corporation,

23 Defendant.

Case No. 2:20-cv-00037-TLN-EFB

**STIPULATED REQUEST FOR ENTRY
OF CONSENT DECREE**

1 On August 3, 2020, Plaintiff The California Sportfishing Protection Alliance sent a letter
2 to the United States Department of Justice and the United States Environmental Protection
3 Agency to trigger a mandatory 45-day review period to review the [Proposed] Consent Decree
4 entered into by the parties on August 3, 2020. *See* 33 U.S.C. § 1365(c); 40 C.F.R. § 135.5. On
5 September 24, 2020, the Department of Justice sent the parties a letter indicating that the federal
6 agencies had no objection to entry of the [Proposed] Consent Decree. That letter is attached
7 hereto as Exhibit 1. Accordingly, the Parties hereby respectfully request that the Court enter the
8 [Proposed] Consent Decree, attached hereto as Exhibit 2, and filed with the Court
9 contemporaneously with this request.

10
11 Respectfully Submitted,

12
13 Dated: September 25, 2020

LOZEAU DRURY LLP

14 By: /s/ Rebecca Davis

15 Rebecca Davis
16 Attorneys for Plaintiff California Sportfishing
Protection Alliance

17 Dated: September 25, 2020

MICHEL & ASSOCIATES, P.C.

18 By: /s/ W. Lee Smith

19 W. Lee Smith
20 Attorneys for Defendants Tri C
Manufacturing, Inc.